

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JENNELL BLACK, ET AL.,

PLAINTIFFS,

v.

THOMAS WEBSTER IV, ET AL.,

DEFENDANTS.

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Case No.: 1:20 -cv-03644-CCB

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MOTION TO EXCEED PAGE LIMIT

The Towns of Greensboro, Ridgely, and Centreville, and, in his official capacity, Dennis Lannon, and in their personal/official capacities, Michael Petyo and Jeannette L. Cleveland, some of the Defendants (“Movants”), by their undersigned counsel, pursuant to Local Rule 105.3, move the Court for leave to exceed the thirty-five (35) page limit by no more than ten (10) pages in the memorandum they intend to file in support of their Motion to Dismiss on or before March 5, 2021.

1. Movants are prepared to respond in the above-captioned action, which is now governed by a seventy-nine (79) page Amended Complaint (ECF 38), filed on February 18, 2021. The amended pleading consists of fourteen (14) counts and names twelve (12) defendants, including the State of Maryland.

2. In the Amended Complaint, Movants essentially are accused under 42 U.S.C. § 1983, *inter alia*, of deliberate indifference in the hiring, training, retention, supervision, and certification of municipal police officers, leading to the death of nineteen-year (19) old Anton Black on September 15, 2018, as well as committing numerous state violations of state law.

3. Movants deny the allegations against them and have prepared a Motion to Dismiss challenging most, if not all, of the claims in the Amended Complaint.

4. Movants could, under the Local Rule, file three separate motions, allowing them a combined maximum of one hundred five (105) pages of memoranda.

5. Instead, for the purposes of judicial economy and efficiency, Movants will file an omnibus motion, thereby implicating the thirty-five (35) page limit established in Local Rule 105.3.

6. Movants need the additional ten (10) pages requested to ensure that each of the counts, allegations, causes, and claims against them in the Amended Complaint is fully addressed.

7. Under these circumstances, Movants believe their request is more than reasonable.

WHEREFORE, Movants respectfully request that their Motion to Exceed Page Limit be Granted.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of March 2021, a copy of the foregoing Motion to Exceed Page Limit was filed electronically and served electronically upon counsel of record.

_____/s/_____
John F. Breads, Jr.